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8 *Attorneys for the Federal Defendants*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 Jacqueline Garcia,

12 Plaintiff,

13 v.

14 Eric S. Cohan, Stephanie Syptak-Ramnath,
Antony Blinken,

15 Defendants.

16 Case No: 2:23-cv-00849-CDS-VCF

17 **Unopposed Motion for Extension of**
18 **Time**

19 **(Second Request)**

20 The Federal Defendants respectfully move for a 30-day extension of time, from
21 September 5, 2023, to October 5, 2023, to file a response to Plaintiff's Complaint (ECF No.
22 1). This is the second request for an extension of time. Undersigned defense counsel has
23 inquired with Plaintiff's counsel, who has no objection to this request for an extension of
24 time.

25 **MEMORANDUM OF POINTS AND AUTHORITIES**

26 Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request
27 additional time to perform an act. In this case, the Federal Defendants request additional
28 time to file a response to the Complaint for the reasons set forth below.

Without admission or waiver by the parties, there have been recent developments at
the agency level, and the parties desire additional time to assess such developments in general
and relative to the existing complaint in this matter. This motion is filed in good faith and

1 not for the purposes of undue delay. Accordingly, Federal Defendants respectfully request,
2 and Plaintiff's counsel does not oppose, this extension of time, from September 5, 2023, to
3 October 5, 2023, to file a response to Plaintiff's Complaint.

4 Respectfully submitted this 30th day of August 2023.

5 JASON M. FRIERSON
6 United States Attorney

7 /s/ Patrick A. Rose
8 PATRICK A. ROSE
9 Assistant United States Attorney

10 **IT IS SO ORDERED**

11 

12 **UNITED STATES MAGISTRATE JUDGE**

13 **DATED:** 9-6-2023